

1 Ira M. Levin
2 ilevin@burkelaw.com, *pro hac vice*
3 Danielle J. Gould
4 dgould@burkelaw.com, *pro hac vice*
5 Joshua J. Cauhorn
6 jcauhorn@burkelaw.com, *pro hac vice*
7 BURKE, WARREN, MACKAY & SERRITELLA, P.C.
8 330 North Wabash Avenue, 21st Floor
9 Chicago, Illinois 60611
10 Telephone: 312.840.7000
11 Facsimile: 312.840.7900
12 *Attorneys for Plaintiffs*
13 ICONIC MOTORS, INC. d/b/a ELGIN VOLKSWAGEN
14 SLEVIN CAPITAL INVESTMENTS, INC.

9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA

11 *In re: Volkswagen 'Clean Diesel' Marketing,*
12 *Sales Practices, and Products Liability*
13 *Litigation*

14 This document relates to:

15 *Iconic Motors, Inc. v. Volkswagen Group of*
16 *America, Inc.*, No. 3:17-cv-3185-CRB

LEAD CASE No. 15-md-02672- CRB

**PLAINTIFFS' ADMINISTRATIVE
MOTION TO HAVE EXHIBITS A-D
AND F-G OF DECLARATION OF
WILLIAM A. SLEVIN, GROUP
EXHIBIT E TO OPPOSITION, AND
PORTIONS OF FED. R. CIV. P. 56(d)
DECLARATION TO PLAINTIFFS'
OPPOSITION TO ROBERT BOSCH
GMBH AND ROBERT BOSCH LLC'S
MOTION FOR SUMMARY JUDGMENT
FILED UNDER SEAL PURSUANT TO
CIVIL L.R. 79-5**

by Plaintiffs:

Iconic Motors, Inc. d/b/a Elgin Volkswagen
and Slevin Capital Investments, Inc.

Hon. Charles R. Breyer

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26 Lead Case No. 15-md-02672- CRB
27 PLAINTIFFS' ADMINISTRATIVE MOTION TO HAVE EXHIBITS A-D AND F-G OF
28 DECLARATION OF WILLIAM A. SLEVIN, GROUP EXHIBIT E TO OPPOSITION,
AND PORTIONS OF FED. R. CIV. P. 56(d) DECLARATION TO PLAINTIFFS'
OPPOSITION TO ROBERT BOSCH GMBH AND ROBERT BOSCH LLC'S MOTION
FOR SUMMARY JUDGMENT FILED UNDER SEAL PURSUANT TO CIVIL L.R. 79-5

1 Plaintiffs, Iconic Motors, Inc. d/b/a Elgin Volkswagen and Slevin Capital Investments, Inc.,
2 respectfully move, pursuant to Civil L.R. 7-11 and Civil L.R. 79-5, that the Court enter an order that
3 Exhibits A-D and Exhibits F-G attached to the Declaration of William A. Slevin (“Slevin
4 Declaration”), Group Exhibit E, and Portions of the Fed. R. Civ. P. 56(d) Declaration of Joshua J.
5 Cauhorn (“56(d) Declaration”) attached to Plaintiffs’ Opposition to Robert Bosch GmbH and Robert
6 Bosch LLC’s Motion for Summary Judgment (the “Opposition”), and any references to them, be
7 filed under seal pursuant to Civil L.R. 79-5. Plaintiffs have a legitimate private interest that warrant
8 sealing, will suffer injury if not sealed, and are unaware of a less restrictive alternative. As set forth
9 in the accompanying Declaration of Joshua J. Cauhorn in Support of Plaintiffs’ Administrative
10 Motion to Have Exhibits A-D and F-G of Declaration of William A. Slevin, Group Exhibit E, and
11 Portions of 56(d) Declaration of Joshua J. Cauhorn Attached to Plaintiffs’ Opposition to Robert
12 Bosch GmbH and Robert Bosch LLC’s Motion for Summary Judgment Filed Under Seal Pursuant
13 to Civil L.R. 79-5, good cause exists for sealing the Exhibits and excerpts designated therein.

14 Plaintiffs therefore request authority to file under seal the unredacted Opposition,
15 Declarations, and Exhibits in their entirety, and to file publicly a version of the Opposition and
16 Declarations that redacts information designated “CONFIDENTIAL” under the Protective Order.
17 [Dkt. No. 5180.]

1 Dated: February 14, 2025

Respectfully submitted,

2 /s/ Joshua J. Cauhorn

Ira M. Levin

3 ilevin@burkelaw.com, *pro hac vice*

Danielle J. Gould

4 dgould@burkelaw.com, *pro hac vice*

Joshua J. Cauhorn

5 jcauhorn@burkelaw.com, *pro hac vice*

BURKE, WARREN, MACKAY & SERRITELLA, P.C.

6 330 North Wabash Avenue, 21st Floor

7 Chicago, Illinois 60611

Telephone: 312.840.7000

8 Facsimile: 312.840.7900

9 *Attorneys for Iconic Motors, Inc. d/b/a Elgin Volkswagen and*
10 *Slevin Capital Investments, Inc.*

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13 **CERTIFICATE OF SERVICE**

14 I hereby certify that on February 14, 2025, the within document was filed with the Clerk of
15 Court using CM/ECF which will send notification of such filing to the attorneys of record in this
16 case.

17
18
19 /s/ Joshua J. Cauhorn

JOSHUA J. CAUHORN, *pro hac vice*

20 *Attorney for Iconic Motors, Inc. d/b/a Elgin*
21 *Volkswagen and Slevin Capital Investments,*